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AUTHOR Mizell, M. Hayes
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ABSTRACT

A current project of the Southeastern Public Education Program (SEPEP) of the American Friends Service Committee is strengthening the implementation of parental involvement requirements of Title I of the 1965 Elementary and Secondary Education Act. Toward this end, SEPEP has provided technical assistance to parent advisory council members in Mississippi, Alabama, Georgia and South Carolina. The project has found that, although nearly a decade has elapsed since the mandatory creation of Title I Parent Advisory Councils (PAC's), in most of the rural south such councils are still struggling for legitimacy and role definition. Some schools have created "paper PAC's" which seldom, if ever, function. Other districts have limited the scope of meetings to such activities as open houses, style shows, or classes to train parents to help their children with school work. Many schools appeared unwilling to provide the information and training necessary for parents to serve effectively on the councils. In spite of the generally negative experiences encountered, the SEPEP staff did find school officials and parents whose attitudes contributed to successful implementation of PAC's. Factors contributing to such success were: (1) a clear message from the school of "we want your support," (2) regular monthly meetings devoted to legitimate concerns, (3) efforts to educate parents about the program, and (4) attitudes of state and federal officials charged with enforcing Title I laws. Eleven recommendations for improving PAC implementation conclude this paper. (DS)

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Implementation of Title I Parent Advisory Councils in the Rural South

by

M. Hayes Mizell
Associate Director
Southeastern Public Education Program
American Friends Service Committee

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"The Roles of Educational Advocacy Organizations
in Supporting Parent Participation
in Educational Decision Making"

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During the mid-1960s the American Friends Service Committee (AFSC) established a program in the Southeastern United States to advocate for, and monitor the progress of, the abolition of the racially segregated school system in that region. Most of the work took place in rural communities and small towns in Mississippi, Alabama, Georgia, and South Carolina with occasional activities in Arkansas and Louisiana. As a result of this program work the AFSC created the Southeastern Public Education Program (SEPEP) to carry on the efforts to achieve a quality integrated public school system in the South.

The AFSC Southeastern Public Education Program works towards creating schools which respect the identity and potential of every student, and which are free of discrimination and prejudgement of a student's ability based on sex, disability, race, and cultural and economic backgrounds. The SEPEP's current projects include work to: (1) Improve school discipline; (2) Strengthen the implementation of parent involvement requirements of Title I of the 1965 Elementary and Secondary Education Act, as amended; (3) Assure the effective implementation of Title IX of the 1972 Education Amendments; (4) Analyze and create a better understanding of the impact of mandated minimum competency programs on the children of the South; (5) Assure the accountability of state systems of public education; and (6) Promote the implementation of equitable systems of education finance. The SEPEP also has an ongoing concern with providing community groups with information, organizing skills, and legal assistance in their efforts to improve the quality of education at the local level. Throughout its existence the SEPEP has utilized strategies of monitoring the local implementation of selected federal laws, working with federal agencies to

ensure their accountability to the people they serve, and alerting the federal government to educational needs and problems that must be met to fulfill congressional mandates.

Dating from its early work to achieve school desegregation the SEPEP has been repeatedly confronted with examples of how local school systems exclude from the decision-making process citizens in general and low-income and minority citizens in particular. Like many school officials elsewhere, educators in the rural South have trouble accepting the participation of the types of persons who in the past were deliberately not educated, or mis-educated, by the schools. This exclusion takes every form from turning away parents from the school, to being discourteous to parents, to refusing to discuss substantive education issues with parents or give serious attention to their concerns.

The passage of Title I of the Elementary and Secondary Education Act in 1965 signaled the beginning of a new interest by the federal government in the education of children from low-income families. Title I currently provides several billion dollars targeted to provide programs for educationally disadvantaged children attending schools in low-income areas. The original Title I law did not specifically mandate parent participation in the program, but by 1966 federal officials working to implement Title I were urging local school officials to involve parents. In 1967 a publication of the United States Office of Education required local school officials to include "appropriate activities or services in which parents will be involved." This requirement was expanded in a 1968 USOE program guide when the goal of parent involvement was defined as building "the capabilities of the parents to work with the school in a way that supports their children's well-being, growth, and development."[1] In a subsequent

1968 program guide the USOE recommended that parent advisory councils be established by local school districts to facilitate parent involvement in Title I.

From that point to the present the mandates for parent involvement in Title I have gradually been strengthened:

-- When Title I was amended by Congress in 1970 the U.S. Commissioner of Education was empowered to require parent involvement.

-- In the fall of 1971 the USOE issued guidelines requiring local school districts to establish Title I parent advisory councils (PACs). Under the guidelines the PACs were to have parents of children receiving Title I services constitute more than a simple majority of the members of the PAC. The PACs were to participate in the planning, development, operation, and evaluation of the Title I projects.

-- When Title I was amended again in 1974 there was a new requirement that local school districts not only have a PAC at the district level (these came to be known as district advisory councils, or DACs) but also in each school with a Title I funded program. These came to be known as school advisory councils, or SACs.[2]

-- The 1978 amendments to the Title I law require local school districts to give PACs the responsibility to advise the district and Title I project schools "in planning for, and implementation and evaluation of, its programs and projects" funded under Title I. The law also contains specific mandates concerning how PACs are to be selected, what information they are to receive, and what training they must receive.[3]

In the years immediately following the enactment of Title I, the Southeastern Public Education Program became interested in the initiatives

to encourage parent involvement in Title I. In its field experiences in working for school desegregation the SEPEP staff had seen the need for parent participation. As early as 1967 a representative of SEPEP was telling Congress:

> The lack of community involvement in the creation of ESEA Title I programs often results in great misunderstandings, and even hostility, between the Negro community and school authorities. Unfortunately, school officials seem to take little time to fully explain to the community how the ESEA funded programs work and the extent of their limitations...It would seem there is a need for local school districts to have an external advisory committee of parents whose children are participating in ESEA programs, or such a committee with representatives of these parents...There needs to be some mechanism, hopefully created voluntarily by local school officials, but if necessary created by law or required by the U.S. Office of Education, that will allow parents and community leaders to express their ideas and opinions, and to know their rights and responsibilities under ESEA funded programs. While the details of ESEA funded programs are public information, in fact such information is not easy to secure on the district level and even those who seek it on the state level are not free of subtle bureaucratic intimidation.[4]

The SEPEP staff saw Title I as an opportunity for parents who had historically been denied access to the decision-making process to not only gain that access but to be involved in the substantive discussions concerning the education programs created to help their children.

While the SEPEP gave some continuing attention to Title I in the late 1960s, most of its attention was devoted to the struggle for school desegregation. However, as desegregation began to be achieved in the early 1970s and as the Title I requirements for parent advisory councils became stronger, the SEPEP gradually turned more attention to working with local PAC members to assure that their school systems were complying with Title I parent participation mandates.

In 1976 the Title I work of the SEPEP expanded significantly when it received a grant from the Carnegie Corporation to provide technical assistance to parent advisory council members in Mississippi, Alabama, Georgia, and South Carolina. To provide this assistance the SEPEP hired three persons to work in each state on a half-time basis. These staff members, called PAC Associates, provided direct assistance to individual PAC members and to Parent Advisory Councils as a whole. Each PAC Associate was responsible for working with PACs in his/her own school district and in two districts geographically contiguous to his/her own. Over the years this staffing pattern has changed so that there is now one full time staff person working on a statewide basis in each of the four states. Each of these staff members is linked to five community persons in different areas of the state who provide information about what is going on with Title I in their area.

During the course of this project the SEPEP staff members have used a wide array of techniques to reach and inform PAC members. They have held workshops and one-on-one "learning sessions" to teach PAC members the details of Title I law and regulations. They have made personal visitations to PAC members' homes. They have assisted PAC members in developing complaints about Title I violations and then they have pursued these complaints at the state and federal levels. Throughout the project the staff has developed a variety of training materials as well as newsletters to inform local PAC members.

Title I PACs in the Context of the Rural South

Local school officials frequently defend the lack of parent involvement in their Title I programs by citing the "fact" that parents do not seem to be interested in participating in the PACs. This is a very real problem that

is not restricted to the rural South. But rather than viewing this poor participation as a problem to be solved, or at least understood, many local school officials seem to use it as a defense for their minimal compliance with Title I parent involvement requirements.

In the SEPEP Title I project it has been found that some Title I parents do not feel their involvement is necessary because, after all, the funds will continue to come to their schools and their children will continue to benefit from the programs regardless of whether the parents are involved in the PAC. This correct perception of Title I as a benefit is not likely to motivate many parents to participate in PACs, particularly when the benefit is relatively new and undoubtedly needed. Why rock the boat?

The notion that people should participate in helping to make decisions which affect them is a basic tenet of the democratic process. It is widely assumed that most people understand the operational meaning of that principle and are prepared to act on it. This is one of the components of citizenship that many people and institutions take for granted. But serving on a deliberative body--like a Title I PAC--is a skill which many people do not have opportunities to develop. There are many PAC members who have had no previous experience as a member of a board or committee. In the rural South there is a paucity of such experiences and those experiences which are available are not likely to be very sophisticated. This means that many Title I parents come to their experience on the PAC with little knowledge of the dynamics of a deliberative group, or how to work most effectively within such a group. The PAC may provide leadership development opportunities to parents but there must be a conscious effort to understand and promote the concept of the PAC as a leadership development

vehicle. Unfortunately, few local school officials believe this to be an appropriate role for the PAC, and most of them do not recognize that the parent participation problems of the PAC are due at least in part to the absence of prior leadership development experiences.

Even under the best of circumstances parents in the rural South must struggle for access and acceptance within the context of a history of poor parent--school official relations. This poor relationship may be attributable to the personality of the school official, the residue of previous conflicts with a particular parent or with a segment of the community, the insensivity of school officials to parent or community concerns, or a variety of other factors. The SEPEP staff have seen this problem on their visits to DAC meetings:

> (The Title I coordinator) came in, a very nervous and defensive man who has been Title I coordinator less than two years, previously a principal for a long time. He and (the PAC chairperson) can't stand each other and the hostility was extremely heavy over their ongoing debate about who was at fault for not notifying parents about this meeting...(The PAC chairperson) brought up parental input and lack of workshops everytime there was a break in the conversation and (the Title I coordinator) would freeze and defend himself. He said that he expected parents to "observe the social amenities" and "do things the correct way." He did talk some about how Title I is hoping to remedy the estrangement between parent and educator.[5]

The difficulty in achieving such a "remedy" is apparent when PAC members continue to experience patronizing behavior by school officials that is inconsistent with parents' perception of reality:

> (The Title I chairperson) said, 'My big gripe is that I get patted on the head and told 'I know what's best for you. I'm going to take care of you.'" She said, "I don't think they're doing what is best for me or my child." ... She wants a meeting of all Title I parents, aides, and teachers but feels that most parents don't even know their kids are in Title I, much less what it is all about

> or what their role might be. She said, "Parents say, 'Why come to a meeting. The political stronghold is too strong to fight in (this county).'"[6]

At times even school officials recognize that they cannot deal well with PAC members. One SEPEP staff member reported on a two hour conversation with a local Title I coordinator in which the school official acknowledged the basic problem he was confronting:

> He asked for my assistance over the coming year in working with the PACs. He specifically asked me to try to bridge the gap which exists between himself and the PAC. He said that the PAC trusts me and does not trust the district.[7]

As though the problems of lack of experience and bad relationships are not enough to discourage parental involvement in the rural South there are also difficulties caused by geographical distance and population sparsity. Many school systems in the South are contiguous with the boundaries of the counties in which they are located. When meetings are held at night it takes a special effort for PAC members to travel twenty miles or more to a meeting about which they have little enthusiasm. Because most PAC members also hold full time jobs and confront issues of economic security on a daily basis, it requires an extra measure of energy and dedication for PAC members to travel significant distances to a meeting which too often has little substance.

The problems mentioned here are not, of course, restricted to the South. But the South's history of deprivation and discrimination, and its impact on the region's school system and social structure, has had the effect of intensifying the problems which PAC members encounter.

Problems in the Implementation of PACs

When the creation of PACs was first mandated, and for some years thereafter, many school districts either ignored the requirement or created

"paper PACs" which existed on paper but which seldom, if ever, met or functioned. Until recently this blatant violation of the law was all but ignored by state and federal officials charged with enforcing Title I laws. The SEPEP staff working on the Title I project continue to find school districts where the very existence of PACs cannot be taken for granted:

> In (an Alabama city school system) the Title I Coordinator admitted that not all of the Title I Schools have School Advisory Councils.[8]

The existence of some PACs is so clouded in mystery that even school officials have trouble understanding what is happening:

> I discovered one SAC meeting I attended in an article in a local newspaper. The article stated that the meeting would be held to elect Parent Advisory Council members. No PAC members were elected. In questioning the principal who led the meeting I discovered that he knew nothing about the article and was not aware elections were supposed to take place. He did not discuss Title I with the participants at all, but talked about air conditioning the school.[9]

In another community a SEPEP staff member found a "paper PAC" that had existed for a number of years because the members of the PAC had never had an opportunity to learn how the PAC was supposed to work. When state officials came into the district and held a hearing on the matter, it became clear how the PAC had "worked":

> (One PAC member) said she knew nothing about the Title I PACs until she got the letter telling her about the meeting Wednesday, the review. I asked her if she had ever received any notices of PAC meetings in the past several years. She had not, in fact she had never heard of Title I at all. Her name was on the list of PAC members since 1975! I showed this list to her and she said she was positive she had never been on the council...(Another PAC member) attended one meeting in 1975 and decided to resign because it was obvious that the council was to be a council in name only. She resigned in writing and they are still using her name as a PAC member for 1978. She said after the first meeting, a couple of months elapsed and (the Title I coordinator) came by her office and asked her to sign some papers for the Council. She said she refused to

> sign them because she didn't know what they were and she couldn't speak for the other council members since they had only had one meeting. She said he left and she never heard from (him) again.[10]

Even if Parent Advisory Councils are created as the law requires, the members of the PACs may not be selected according to the legal mandates. Over the years the legal requirements regarding the selection of PAC members have become more and more specific until now the selection process is fairly complex. The evolution of these detailed requirements is rooted in local experiences in which school officials have attempted to "stack" the membership of the PAC to ensure its compliance with the school district's agenda. The law is very clear that both District Advisory Councils and School Advisory Councils must "have a majority of members who are parents of children to be served by programs" funded by Title I, and these parents must "be elected by the parents" in the appropriate district or project school.[11] When a SEPEP staff member attended PAC meetings in two districts in Georgia she found the requirement for the election of PAC members had not been followed:

> (I) asked a parent how long she had been on the council. The parent replied very proudly, "Oh, I've been asked to serve for four years." To this a teacher responded, "Yes, you've been around for a long time. I asked you to serve last year." (I) found it necessary to talk about the selection process.
>
> Although it had been pointed out several times that members should not be appointed, two members unknowingly stated in a DAC meeting that they were "asked to serve."[12]

The motives of school officials may not always be malevolent, however. Some simply don't want to go to the trouble and inconvenience of conducting a PAC election according to the legal requrements. Others have been frustrated by previous honest efforts to assemble a PAC only to find that there was little interest in the election, or once elected the PAC members would not participate.

The credibility of local school officials' complaints about parents' lack of interest in the PACs is suspect when those same officials demonstrate so little interest in providing the parents with the information and training necessary to be effective PAC members. The issue of providing information and training to PACs is so basic that the Title I law now requires local school systems to provide PAC members with specific information and training. Again, these requirements have evolved from the local experiences of parents. In the early Title I program guides and regulations there was no mandate for providing information and training. Then the directives appeared in subsequent regulations. They were almost universally ignored by school systems in the rural South. In 1978 the Title I amendments included sections on "Access to Information" and "Training Programs" in Section 125 which covers parent involvement.[13]

These "access issues," as they are referred to by the SEPEP staff, are fundamental to operation of a PAC. If PAC members do not have information about the Title I law and regulations, or if they do not know how their local school district is spending Title I funds, they cannot carry out their mandate to advise the school system on the operation of the Title I program. Knowledge and understanding are power, and the experiences of SEPEP staff members are replete with examples of how PAC members are prevented from gaining both:

> Upon receipt of my newsletter, several parents tore off a returnable portion of the newsletter and mailed their comments back to me for further communication. One return comment which I received from a parent states, "I was a chairman for Title I at _____ Elementary School in a (small community in) Alabama. Does that make me a member of a PAC?" [14]

> On October 10, 1978, a Title I parent reported having to stage a sit-in to obtain a copy of the current Title I

> application. Parents do not receive training to acquaint them with the role and responsibility of the PAC member. Parents have requested to meet with (the Title I coordinator) to discuss concerns they had and were informed that he was only available to principals.[15]
>
> None of the PAC members interviewed had been provided with a copy of Title I of the Act, the federal regulations, or state guidelines. Several of those interviewed stated that they had been given some good information about Title I and the district's Title I program. Neither of the councils, however, had been given a copy of the district's Title I application.[16]
>
> The only training material provided was the 1978 outdated State PAC handbook brought by the state PAC coordinator last fall, a partial copy of the project and last year's evaluation.[17]

The SEPEP staff have found that even when local school districts are willing to provide PAC members with information they are not likely to take the time and energy to explain these materials. Many professional educators have difficulty interpreting Title I law, regulations, and project applications but do not empathize with similar frustrations of PAC members. In recent years private non-profit organizations have begun to take the essential Title I documents and rewrite them so they can be better understood by PAC members. Commercial publishers have also developed training materials for PAC members and some school officials are beginning to make greater use of this information. However, most local officials do not have the skills to conceive, plan, and carry out an effective training program for PAC members and this continues to be a problem in many districts.[18]

Even if properly informed and trained, PAC members have a tremendous responsibility. If the legal mandate to advise the local school system on the planning, implementation, and evaluation of the Title I program is taken seriously, it requires a great deal of discussion, consultation, and oversight. But many PACs meet only several times a year, clearly not often

enough to carry out the PACs' responsibilities. In addition, there is frequently a high rate of turnover among council members and this means that PAC members often do not have enough time to learn how to effectively perform in their roles. Council members recognize this deficiency:

> One parent asked if they "could meet more than quarterly because something as important as this, parents need to meet more than three or four times." The coordinator said yes, but didn't follow up by asking how often they wanted to meet.[19]

It is because councils have a history of infrequent meetings that the 1978 Title I amendments included a requirement that SACs meet "a sufficient number of times per year, according to a schedule and at locations to be determined by such council."[20]

Regardless of how many meetings are held, however, PACs do not carry out their mission when they do not understand their role and encounter a variety of subterfuges which compromise the integrity of the PAC. The PACs' "role" is a matter of continuing debate. Many local school officials view the PAC as a vehicle for training parents how to help their children in their school work:

> (The Title I worker) is using the "Bowdoin Method" for training parents, and it looked, from glancing through a workbook, like it is a course on teaching parents to help their children learn at home.[21]

> The session on Parent Involvement and the New Law conducted by Mrs. Ruth Bowdoin, inventor of the Bowdoin Method was disappointing and contained no substantial information to those who attended. Mrs. Bowdoin stated in one session, "Now I don't know anything about the law, but I can tell you all about the Bowdoin Method of Parental Involvement." While this method is good for general parental involvement, there were no specifics regarding Title I involvement. Therefore, the State missed an opportunity to provide training to parents.[22]

Though the Title I law makes no mention of this approach as the appropriate

role for PACs, a number of local school officials seem to feel that emphasizing this role is more compatible with their self-interest. Considering that most parents come to their experience on the PAC with no idea of their role, it is obvious that the approach advocated by the local school officials can largely determine what role the PAC will play.

Other school officials choose different role models to communicate to PAC members:

> (A State Title I official) led the "sharing session" off by reading a newspaper clipping about a PAC in S.C....It explained that a SAC had held an open house at a particular school!!!! Unless I missed the point, he really thinks that is parent involvement.[23]

> PAC meetings are often not actually meetings at all in the strict sense of the word. At one...SAC meeting we made book covers out of pieces of wall paper. In (another) county one Title I Migrant meeting was a fashion show for the sewing students to display their accomplishments.[24]

> There were three (council) members who identified themselves as parents and two of them worked in the school cafeteria. It appeared that the other members were community representatives and school employees. The parents themselves were very quiet and nodded in agreement when the superintendent and teachers said they didn't feel they should go into a training session at this time. The chairperson of the DAC... is the husband of a Title I teacher and does not have children in the program. At the beginning of the meeting, the chairperson was given an agenda evidently prepared by the coordinator. From conversations with other DAC members who were not present at the meeting, it was revealed that the majority of the council members are community people, and the only activity ever engaged in by the council is the yearly luncheon and a tour of Title I schools.[25]

> (A PAC member) had a whole different complaint about the (Title I) banquet. She said that the (DAC secretary) was not at the banquet and a school official took the minutes. (The PAC member) said that the minutes read as if the new project application was discussed in full when it fact it was barely mentioned...She then told me that she had called the school and complained and they said they were planning on holding a special meeting to discuss the application. (The PAC member) said they do this sort of thing often--that minutes suggest an activity was completed and, unless

> someone lodges a complaint, it is completed--and regardless, the minutes still read as if the PAC has been setting the world on fire.[26]

The confusion about the PAC role, and the opportunities that the lack of clarity provides to school officials who wish that role to be minimal, continues to compromise significantly the abilities of PACs to carry out the mission assigned to them by Congress. One prestigious study of Title I has recommended that the U.S. Office of Education (now the Department of Education) require state departments of education and local school districts to "explain, in writing, the nature and scope of parent involvement in the 'planning, implementation, and evaluation' of Title I programs with specific reference to the parent's role with respect to each Title I program requirement."[27] The USOE/DE has apparently not issued any such requirement though it is anticipated that the matter of the PACs' role will be extensively addressed in the forthcoming policy manual now being prepared for publication by USOE/DE.

The Effective Implementation of PACs

In spite of the generally negative experiences encountered by the SEPEP staff, they have occasionally encountered school officials and parents whose attitudes contribute to the successful implementation of PACs. One local coordinator was found to be using the same techniques for communicating with parents as other coordinators but he was having far greater success. The telephone calls and written communications were accompanied by a clear message of "we want your support." The coordinator told a member of the SEPEP staff:

> The greatest asset we have in involving our parents is we want them to be a part of what we are doing. We don't see them as meddlers and troublemakers. We see

> them as helpers--supportive helpers. We try very hard to make them feel wanted. We convince them that they have something to offer and we, the professionals, could not be successful without them.

In response to this attitude, parents were found to be attending PAC meetings in large numbers and to be traveling to other counties to attend workshops.[28]

Another Title I coordinator was holding monthly meetings for the PAC and the meetings were devoted to such legitimate activities as reviewing the Title I project application and evaluation. He encouraged PAC members to observe Title I classes in session and developed a questionnaire to solicit the PAC members' views about the pre-submission application. At the time the coordinator was visited by a SEPEP staff member he was planning to develop an evaluation of PAC activities to include as a part of the district's evaluation of the Title I program. In spite of these positive efforts the coordinator had found it difficult to get PAC members to be forthcoming with suggestions to improve program effectiveness.[29]

A SEPEP staff member was "pleasantly surprised" at the attitude of a state department of education Title I official who gave a presentation at a training for PAC members:

> She did a good flannel board presentation on "What is Title I?" ...She gave a nice pitch for going beyond Sec. 125 of the law (on your own) as parents can understand it and should learn all they can. She said a number of good things about PAC calendars, about needs assessment and starting with the neediest of the needy...She said at one time, "You know what I've found out--people often don't go out to meetings not because they aren't interested, but because they are afraid and feel they don't have enough education themselves. Part of the PAC work is to provide a little spark to help parents feel good about themselves."[30]

In one school district where a SEPEP staff member has worked with a PAC to correct a number of problems caused by the resistance and subterfuge of local school officials, there has been significant progress because of

the energy of the parents and teachers who serve on the PAC. The PAC members lodged a complaint about the Title I coordinator's gross violations of the law, and they devoted a great deal of time and energy to successfully pursuing the complaint. At the suggestion of the PAC the superintendent agreed to employ a consultant to come into the district to help the Title I coordinator and the PAC develop a positive working relationship, as well as to help the PAC initiate substantive activities. The consultant selected was mutually chosen by the school superintendent and the PAC. Presently he is working with the PAC to develop and execute a process for the PAC to conduct its own independent assessment of Title I funded projects in the district.[31]

The fact that many local school officials do not take Parent Advisory Councils seriously does not occur in a vacuum. Often the local officials reflect the attitudes of state and federal officials charged with enforcing the Title I laws. One state Title I official, recently replaced, said, "I'm not sure we need all of that advice, and I am not sure what we will do with it."[32]

If PACs are going to function effectively at the local level the Title I coordinators must know that the state officials expect the law to be followed, that their compliance with the law will be closely monitored, and, at the same time, that they can turn to the state department of education for technical assistance if needed. The SEPEP staff have found many state Title I officials to be limited and lethargic in their enforcement of the law. When one group of parents filed a complaint about local Title I parent involvement practices it took the state department of education six months to investigate the complaint. By the time the department released its findings at the end of the school year the SEPEP staff member found

the department had "mildly suggested that the complaint should have been resolved at the local level, and suggested that positive and direct action be taken to improve the implementation of requirements concerning parental involvement and the proper handling of formal and informal complaints."[33]

After another SEPEP staff member had thoroughly documented a number of parental involvement violations in a school district, and the state Title I officials had investigated, their findings were interpreted by a local newspaper as an "A-plus on parental involvement." The staff member wrote the chief Title I official in the state pointing out the deficiencies in the investigation. She stated that the state officials had allowed the local officials to determine which PAC members would be interviewed, and that the investigation looked at the PACs only on the specific date of the site visit. In addition she pointed out that the review consisted of seventeen questions to be answered "yes" or "no" with no opportunity provided for PAC members to provide other information.[34]

In a subsequent investigation of another parent involvement violation in a different school district, the state Title I officials were closely monitored by the SEPEP staff person. The quality of the investigation significantly improved and for the first time the State required a local district to take corrective action concerning its Title I PAC activity. However, when the state officials returned for a follow-up review, it became clear that nothing could be taken for granted:

> The State found the PAC activity to be in compliance with the law, which simply meant the district had elected a new council according to Title I law. The review did not address the fact that the State had required the local school district to immediately implement a training program for the PACs and this had not taken place.[35]

The problem of minimal law enforcement continues to plague PAC implementation.

Even though the SEPEP staff have found that most local school officials lack both the skills and inclination to effectively train PAC members, many state departments of education (or state education agencies--SEAs) have failed to provide the leadership and training to the local officials which might help change this pattern. State officials say they can only provide assistance "upon request" from local coordinators. Some Title I coordinators acknowledge they need help:

> Numerous Title I coordinators have expressed the need to receive more training in the role and responsibility of the PAC. The majority of coordinators I have spoken with do not mind saying that they are in need of assistance in this area.

Because some local officials do not receive helpful assistance from the state departments of education, they ask the SEPEP staff to provide training. While the staff have provided such training, they do not see it as their responsibility to perform the work which rightfully should be carried out by state and local school officials. At one meeting of Title I coordinators from throughout a state a state department of education official handed out the name, address, and telephone number of a SEPEP staff member and suggested the coordinators contact her to provide training. While this may be viewed as a positive step in some respects, it should be noted that state officials have never drawn upon the developed expertise and field experience of SEPEP staff to help plan and execute training programs provided by the state.[36]

Just as local Title I officials are not likely to carry out the parent involvement requirements of the law vigorously unless there is strong leadership and law enforcement from the State, so is the State not likely to demonstrate such a posture without the conscientious enforcement of the law

from the Federal level. In recent years the Federal leadership has improved, and Federal Title I officials have been receptive to meeting with SEPEP staff members to discuss complaints and field experiences. But there are still frustrations and disappointments. The Federal Title I officials who conduct annual reviews of SEAs sometimes appear unnecessarily deferential to state officials and seem reluctant to demand that SEAs carry out the spirit and intent of the law, as well as its letter. When local PAC members are struggling to make their PAC work in the face of local resistance from school officials, it is difficult to accept a Federal Title I official's explanation that the review team can't meet with the parents without the school district's permission. In addition, the quality of the Federal officials' reviews of the state and local school systems is questionable, as are the reports on the reviews. This may be due partly to the fact that there are not enough Federal officials to enable them to spend more than a few days conducting each state review.[37]

Recommendations for Improving PAC Implementation

This paper has demonstrated that nearly a decade after the first requirements for the creation of Parent Advisory Councils, the PACs in most of the rural South are struggling for legitimacy and role definition. They have received little help. Cast adrift in a leaky vessel many PACs have foundered in a hostile sea.

If PACs are not only to survive, but to serve a legitimate function in the structure of education governance, then specific steps must be taken to ensure their viability:

(1) Parent Advisory Council members must have access to on-going leadership development and issue-related training programs specifically

designed to meet their needs. "Access" means not only the availability of such training within relatively easy reach of the PAC members, but it also means the financial support which will enable them to take advantage of these programs. Federal Title I officials should ensure that such training is available to local PACs, whether provided by local school districts, the state department of education, a non-profit or commercial organization, a college or university, or regional training centers. The training should be monitored periodically by Federal officials to determine that it is meeting the needs of PACs as they perceive and express their needs. In addition, state Title I officials should be directed to develop and maintain on an annual basis a complete mailing list of all PAC members in the state. This mailing list should be used to notify all PAC members of training opportunities available in the state, or in their region of the state. All Title I meetings of a training nature sponsored by state departments of education should routinely be announced to PAC members well in advance of such meetings, and should be open to any PAC member who wishes to attend.

(2) The parent involvement sections of the Title I law should not be considered as the least important and most expendable requirements by Federal, State, and Local Title I officials. The parent involvement requirements must be strongly enforced. Federal officials must make it clear that state departments of education and local school systems are expected to enforce those requirements, and that their level of enforcement will be subject to continuing scrutiny.

(3) The States must provide training to local Title I officials concerning how to work with and involve PAC members, the role and responsibility of PACs, and what resources are available which will enable the local officials and the PACs to receive continuous in-service training.

(4) Community based organizations concerned with the interests of minority and low-income citizens should begin to focus more attention on PACs as vehicles for leadership development, understanding the dynamics and personalities of local school systems, and reviewing the impact of the educational program on disadvantaged children. Such groups should give consideration to obtaining VISTA workers to work with PACs.

(5) The Department of Education should initiate a project to identify and publicize exemplary models of PAC effectiveness. There should also be an aggressive effort to disseminate information concerning the specifics of how the PACs work, techniques and processes utilized, and a description of the PACs' accomplishments.

(6) In subsequent amendments to Title I, local Parent Advisory Councils should be given the responsibility to certify that the local school district's application for Title I funds reflects the educational needs of children to be served by Title I funded programs. The PACs should also certify that they are satisfied the programs funded by Title I two years prior to the current application benefited the children who participated in them and, as a whole, contributed to the children's improved educational performance.

(7) State departments of education should require that local school districts' applications for Title I funds include a narrative, written by the DAC, describing how the DAC has carried out its legislative mandate to advise the school system on the planning, implementation, and evaluation of the Title I program.

(8) The regional Title I technical assistance centers should be directed to respond to requests for assistance from local Parent Advisory Councils.

(9) In subsequent amendments to Title I, state departments of education should be required to facilitate the creation of and to work with a statewide advisory council. This council would have the responsibility to work with the state department of education to assure that it is providing the leadership, technical assistance, and monitoring and enforcement functions necessary for the effective implementation of the Title I parent involvement requirements. The Department of Education should initiate a study of current statewide councils to determine the most effective procedures for selection of members, structure, and operation. This study could then be used by Congress as a basis for formulating the amendment described above.

(10) DACs should be authorized to employ, with the advice and consent of the local Title I official, a staff person (full or part time) to work with PACs in the school district to facilitate their effective operation. The primary functions of this staff person should be restricted to assisting PACs in carrying out their mandated role of advising the school system on the planning, implementation, and evaluation of the Title I program. The staff person should be accountable only to the DAC but the individual's performance should be separately evaluated on an annual basis by the DAC and the local Title I official.

(11) The Department of Education should develop a standard slide-tape presentation which covers the essential information a PAC needs to know about Title I, the specific responsibilities of the PAC, the optional responsibilities of the PAC, the rights of the PAC, and how the PAC should be organized to operate effectively. The slide-tape presentation (or more than one if necessary) should be made available at cost to state departments of education, local school districts, and PACs. Local school officials and

PAC representatives should be involved in conceiving the presentation, as well as in reviewing it at various stages of development.

There are those who argue that Title I Parent Advisory Councils are but one more unworkable model of participatory democracy foisted off on overburdened institutions. It is easy to be cynical about representative democracy and about efforts to bring into the mainstream of the decision-making process those people who previously have been shut out of that process. Certainly it is a bewildering and even frightening experience for PAC members to be thrust into roles for which no one prepared them and which seem unclear no matter how well they are prepared. Certainly it is not unexpected that PAC members and local school officials are suspicious of each other, or manipulate the PAC meeting, or simply grope for purpose and direction when they have so little support. It is not even unexpected that some PAC members and school officials wonder why the PAC is necessary when Title I seems to be doing so much good.

Like many people, PAC members and local Title I officials simply want to be told in very clear, specific, and step-by-step terms what they are expected to do and how they are expected to do it. But when dealing with a law as complex as Title I it takes a lot of effort to provide this kind of specific assistance and direction. Many State and Federal officials do not exert that effort, perhaps because they aren't interested, or are not creative, or fear the political consequences of appearing too directive.

Regardless of the barriers, PACs are essential as a means to advocate for the educational interests of disadvantaged children. Those children have few people in their corner. If Title I is to work on

behalf of those children, then the PACs must work as well. It is not that PACs are unworkable, it is that too few people really care about the parents of disadvantaged kids. Worse than that, it appears that some school officials and bureaucrats think that parents are crazy, or not capable, or want to run the schools.

Footnotes

[1]Robert Silverstein and Daniel M. Schember, An Analysis of the Basis for and Clarity and Restrictiveness of the Program Requirements Applicable to Local School Districts Applying for Grants under Title I of ESEA, (Washington, D.C.: Lawyers' Committee for Civil Rights Under Law, 1977), p. 748.

[2]Don Davies et al., Federal and State Impact on Citizen Participation in the Schools, (Boston, Mass.: Institute for Responsive Education, 1978), pp. 12-13.

[3]Public Law 95-561: Title I--Amendment to Title I of the Elementary and Secondary Education Act of 1965, (Washington, D.C.: United States Office of Education, 1978), pp. 16-17.

[4]M. Hayes Mizell, "Testimony Prepared for the Subcommittee on Education, Labor and Public Welfare Committee, United States Senate, Regarding the Elementary and Secondary Education Act and Equal Educational Opportunity," (MSS in SEPEP office, Columbia, S.C., 1967), pp.5-6.

[5]Judy Barber, "Mississippi SEPEP Title I, Report #18," (MSS in SEPEP office, Jackson, Miss., 1980), p. 4.

[6]Barber, Report #20, pp. 2-3.

[7]Bettye Boone, "Memorandum to Hayes Mizell, July 10, 1979," (MSS in SEPEP office, Columbia, S.C.).

[8]Helen Moore, "Alabama AFSC-SEPEP Title I PAC Project, Annual Report, 1978-1979," (MSS in SEPEP office, Columbia, S.C.), p. 5.

[9]Ibid, p. 6.

[10]Boone, "Memorandum to Hayes Mizell, January 31, 1979."

[11]Public Law 95-561, p. 16.

[12]Eunice Richard, "Georgia Title I Report, 1978-1979," (MSS in SEPEP office, Macon, Georgia), pp. 13, 15.

[13]Public Law 96-561, p. 16.

[14]Helen Moore, "Comments on Proposed Title I Regulations, July 30, 1979," (MSS in SEPEP office, Columbia, S.C.), p. 6.

[15]Richard, p. 17.

[16]Garlin A. Hicks (Chief Supervisor, Allocations Section, Office of Federal Programs, South Carolina State Department of Education), "Letter to W. Mann Batson (Superintendent, Dorchester County School District No. 1), February 15, 1979," (MSS in S.C. State Department of Education, Columbia, S.C.).

[17]Barber, Report #18, p. 2.

[18]Some local Title I officials recognize their lack of skill: "(The Title I coordinator)...wanted to know if I would be planning any workshops in (his) area...He said that the district needed my help in training the PACs for next year. He kept reinforcing the fact that the district desperately wanted parent input in the program but needed assistance in achieving this goal. I feel he is being honest on this point." Boone, June 25, 1979.

[19]Richard, p. 12.

[20]P.L. 95-561, p. 16.

[21]Moore, MSS of Report, 10-1-79 to 10-19-79, (MSS in SEPEP office, Columbia, S.C.), p. 6.

[22]Richard, p. 8. To a certain extent the U.S. Office of Education (now the Department of Education) is reinforcing this concept of parent involvement by the publication of a booklet titled "Working With Schools: A Parents' Handbook." The booklet is devoted almost exclusively to how individual parents can work with their child's school, and the child, to improve his/her education. While this is an appropriate publication it has the effect of reinforcing the concept of parent involvement only as a process for individual parents to work on behalf of the education of their own children. It should also be noted that there is a paucity of similarly appropriate material for PAC members concerning their role, responsibilities, and operation.

[23]Boone, "Report on Work, March 12-May 9, 1979," (MSS in SEPEP office, Columbia, S.C.), p. 6.

[24]Moore, p. 6.

[25]Richard, p. 15.

[26]Moore, June 25-29, 1979, pp. 3-4.

[27]Silverstein, p. 746.

[28]Richard, p. 22.

[29]Boone, June & July 1979.

[30]Barber, Report #16, p. 2.

[31]Boone, "Highlights of SEPEP's Work with Berkeley County's Title I Parent Advisory Councils," (MSS in SEPEP office, Columbia, S.C., 1980).

[32]Moore, "Annual Report, 1978-1979," p. 18.

[33]Richard, p. 10.

[34]Boone, "Letter to Garlin Hicks, November 13, 1978," (MSS in SEPEP office, Columbia, S.C.).

[35]Boone, "Highlights of SEPEP's Work with Berkeley County..."

[36]Boone, "State Education Agency (South Carolina)," (MSS in SEPEP office, Columbia, S.C.), p. 3; Richard, "Monthly Report, September 6-October 5, 1979," (MSS in SEPEP office, Macon, Ga.), p. 5.

[37]Richard, "Georgia Title I Report, 1978-'79," pp. 19-21, 24; Boone, "Highlights...," p. 2.